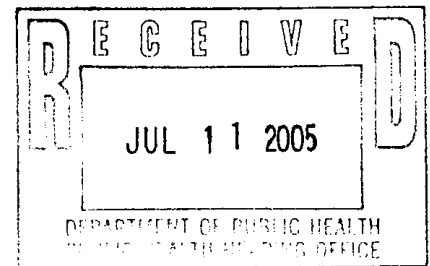


**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE SYSTEMS BRANCH**



In re: Katherine Lawrence, LPN

Petition No. 2005-0505-011-015

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Katherine Lawrence:


1. Katherine Lawrence of Clinton Corners, New York (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut practical nurse license number 0025600.
2. At all relevant times, respondent was employed as a nurse at Sharon Health Care Center (hereinafter "the facility") in Sharon, Connecticut.
3. On or about November 13, 2004, CP was a resident of the facility. She was 98 years old. She resided on the lower level.
4. On or about November 13, 2004, at approximately 6 a.m., respondent was concluding her shift as the charge nurse on the lower level.
5. At or about 6 a.m., CP rang her call bell to be toileted. The nurse aide assisting CP tried to put on the resident's shoes. When the resident refused to wear those shoes, the aide went to consult with respondent.
6. At that time respondent went to the resident's room and forcefully put the shoes on the resident's feet despite the resident's protests that she could not wear them. Respondent loudly commanded CP to get up and walk to the bathroom. When the resident again complained about the shoes, respondent told her she could just pee in her bed.
7. As a nurse aide was ambulating CP to the bathroom, CP's knees gave way and the aide lowered her to the floor. When CP complained that the new shoes had injured her leg, respondent loudly clapped her hands and told CP she had given a fine performance.
8. Respondent instructed the aide to leave CP on the floor.
9. While CP was lying on the floor of her room, respondent fully opened the window in the room and pulled up the resident's johnny high enough to expose the resident's buttocks.

10. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b)(2).

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Katherine Lawrence as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 27th day of June 2005.



Jennifer Filippone, Section Chief
Practitioner Licensing and Investigations
Healthcare Systems Branch

RAS/Lawrence/legal/SOC/62105